

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

**CHARLES A. PEARSON, AIS 182691,)
Plaintiff,)
vs.) CASE NUMBER: 2:06-CV-828-MEF
K.L. BYRD, et al,)
Defendants,)**

**DEFENDANT C.G. GRUHN'S SUBMISSION OF
VOIR DIRE EXAMINATION QUESTIONS**

COMES NOW Defendant Officer Christopher G. Gruhn and submits the following questions and topics for voir dire examination of the jury venire:

1. Does any member of the venire know the Plaintiff Charles A. Pearson?
2. Does any member of the venire know personally, or know anything about, any of these witnesses expected to testify?
 - A. Kevin Byrd;
 - B. Christopher Gruhn;
 - C. Benjamin Harrison;
 - D. Don Corkran;
 - E. Gary Reardon;
 - F. Guy Naquin;
 - G. Kenneth Bolling.

H. Lance Gambrel;

I. Dr. Marcial J. Mendez;

J. Michael White;

K. Desmond Payne;

L. Terry Howard;

M. Dorothy Howard

3. Has any member of the venire ever been in law enforcement in any manner, or have any family members or close friends in law enforcement?

4. Has any member of the venire ever studied criminal justice, or law, or ever applied to a police academy?

5. Has any member of the venire ever had any military experience?

6. Has any member of the venire ever had a negative encounter with a policeman?

7. Does any member of the venire have a family member or close friend who has been arrested by a policeman? If so, did that person complain, even privately, about the treatment he or she received by the police?

8. Does any member of the venire have an opinion that police generally use too much force in making an arrest?

9. Does any member of the venire have an opinion or feeling, however slight, that policemen are untruthful or corrupt? In other words, does anyone just think policemen are someone you just cannot trust, or whom you are suspicious of in any event?

10. Does any member of the venire have a reason, whatever it might be, that would prevent you from being fair and impartial in hearing the evidence, and if it is warranted, rendering a verdict in favor of the policemen if the evidence does not reasonably satisfy you that plaintiff is not entitled

to recover anything?

11. Has any member of the venire ever had a positive experience with a policeman?
12. Does any member of the venire have the opinion that, just because someone brings a lawsuit, that they are probably entitled to recover something?
13. Does any member of the venire have any physical problems, such as bad back, poor hearing, arthritis, illness, or anything which makes sitting for extended periods of time uncomfortable or unpleasant, which would render your jury service uncomfortable?
14. Is any member of the venire going to miss a special event, like a birthday, anniversary, school play or church or social function if you are chosen to sit on this jury? If so, would that fact leave you distracted or resentful such that you couldn't give your complete and undivided attention to the case before you?
15. Are there any other reasons we have not touched upon which would render you unable, unwilling or incapable of sitting as a juror and giving all the parties a fair and impartial review of the evidence, and rendering a proper verdict thereafter?

Wherefore, Defendant Officer Christopher G. Gruhn respectfully moves this Honorable Court to question, or alternatively, to allow counsel for Defendant to question the jury venire concerning the foregoing topics.

s/ Scott W. Gosnell
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CERTIFICATE OF SERVICE

I hereby certify that on this the 20th day of June, 2008, I have electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will provide notice to the following CM/ECF participants, **Wallace D. Mills**;

and I hereby certify that I have also mailed by United States Postal Service the document to the below-named non-CM/ECF participant:

Charles A. Pearson, Jr.
AIS 182691 (H01-086A)
St. Clair Correctional Facility
1000 St. Clair Road
Springville, Alabama 35146-5582

s/Scott W. Gosnell
OF COUNSEL